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12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION

16 IN RE: HIGH-TECH EMPLOYEE
17 ANTITRUST LITIGATION

18 THIS DOCUMENT RELATES TO:
19 ALL ACTIONS
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Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ANNE B. SHAVER
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
SEAL PURSUANT TO CIVIL LOCAL
RULES 7-11 AND 79-5(d) and (e)**

1 I, Anne B. Shaver, declare:

2 I am an associate in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, a
3 member of the State Bar of California, and am admitted to practice before the United States
4 District Court for the Northern District of California. I am one of the attorneys for Plaintiffs in
5 this action. I make this declaration based on my own personal knowledge. If called upon to
6 testify, I could and would testify competently to the truth of the matters stated herein.

7 1. The following exhibits to the Declaration of Anne B. Shaver In Support of
8 Plaintiffs' Opposition to Defendants' Joint Motions *In Limine* have been designated
9 CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES by Defendants:

- 10 2. **Exhibit A:** March 15, 2013 deposition of Bruce Chizen.
- 11 3. **Exhibit 1:** March 19, 2013 deposition of Sergey Brin
- 12 4. **Exhibit 2:** January 24, 2013 deposition of Ed Catmull.
- 13 5. **Exhibit 3:** December 7, 2013 deposition of Tim Cook.
- 14 6. **Exhibit 4:** December 11, 2013 deposition of David Lewin.
- 15 7. **Exhibit 5:** March 28, 2013 deposition of George Lucas.
- 16 8. **Exhibit 6:** August 3, 2012 deposition of James Morris.
- 17 9. **Exhibit 7:** December 7, 2013 deposition of Kevin Murphy.
- 18 10. **Exhibit 8:** February 20, 2013 deposition of Eric Schmidt.
- 19 11. **Exhibit 9:** December 7, 2013 deposition of Edward A. Snyder.
- 20 12. **Exhibit 13:** November 25, 2013 Expert Report of Kevin Murphy.
- 21 13. **Exhibit 14:** November 25, 2013 Expert Report of Edward Snyder.
- 22 14. **Exhibit 15:** November 25, 2013 Expert Report of Eric Talley.
- 23 15. **Exhibit 16:** October 28, 2013 Expert Report of Matthew Marx.
- 24 16. **Exhibit 17:** December 11, 2013 Reply Expert Report of Matthew Marx.
- 25 17. **Exhibit 18:** October 28, 2013 Expert Report of Edward Leamer.
- 26 18. **Exhibit 19:** December 11, 2013 Expert Report of Edward Leamer.
- 27 19. **Exhibit 80:** Plaintiffs' Exhibit 0080, excerpt from Intel data.
- 28 20. **Exhibit 278:** Plaintiffs' Exhibit 278, 231APPLE002150.

21. **Exhibit 279:** Plaintiffs' Exhibit 279, 231APPLE002151.
22. **Exhibit 281A:** Plaintiffs' Exhibit 281A, 231APPLE002217-19.
23. **Exhibit 637:** Plaintiffs' Exhibit 637, GOOG-HIGH-TECH-00000076-77.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 17th day of April, 2014, in San Francisco, California.

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Anne B. Shaver
Anne B. Shaver